

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE SOUTHERN DISTRICT OF ILLINOIS**

IN RE:	)	CHAPTER 7
	)	
BRANDY N. CLARK,	)	CASE NO. 15-30554
	)	
DEBTOR.	)	

**TRUSTEE'S APPLICATION TO EMPLOY ATTORNEY SPECIALLY**

COMES NOW Cynthia A. Hagan, Trustee, and for her application to employ attorney specially, states as follows:

1. The debtor filed her Chapter 7 case on April 9, 2015.
2. Applicant is the duly qualified and acting trustee in this case.
3. The Applicant proposes to employ Shaun M. Falvey, and the law firm of Brown & Crouppen, P.C., 1 Metropolitan Square, Ste. 1600, St. Louis, MO 63102 to prosecute for the bankruptcy estate and represent the trustee in a personal injury case filed on behalf of debtor, Brandy N. Clark.
4. The Applicant proposes to compensate the attorneys 35% contingency fee (40% if suit is filed). In addition to the firm's compensation, they are entitled to be reimbursed for the reasonable costs of prosecution of the claim, subject to the approval of the Court after the rendering of such services, except that the bankruptcy estate shall not be liable for any costs or expenses absent recovery. Applicant is informed and believes that the contemplated compensation is reasonable in light of the rates charged by other attorneys in the Southern Illinois area.
5. The Applicant is informed and believes that the above-named attorneys do not hold or represent an interest adverse to the estate and that the employment of the above-named attorneys is in the best interest of the estate.

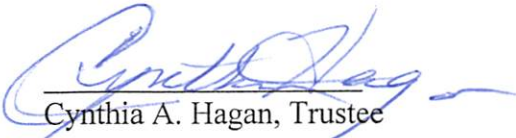
6. Attorney, Shaun M. Falvey has executed a Verified Statement attached hereto.

7. The proposed attorneys do not have any connections with the debtor, creditors, or any other party in interest, their attorneys or accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except as debtor's prepetition personal injury attorneys.

WHEREFORE, the Applicant respectfully requests this Honorable Court to enter an Order Approving the Employment of Shaun M. Falvey and Brown & Crouppen, P.C. as attorneys for the estate.

Date: September 22, 2015

Respectfully submitted,

  
Cynthia A. Hagan, Trustee

Cynthia A. Hagan  
Hendricks & Hagan  
206 West College, Suite 12  
Carbondale, IL 62901  
Tel: 618-529-2274  
Fax: 618-529-1638  
cynthiaahagan@aol.com

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IN RE:	)	CHAPTER 7
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BRANDY N. CLARK,	)	CASE NO. 15-30554
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**VERIFIED STATEMENT OF PROPOSED ATTORNEY SHAUN M. FALVEY**

I, Shaun M. Falvey, declare:

1. I am an attorney duly admitted to practice in the State of Illinois.
2. I am a member of the law firm of Brown & Crouppen, P.C. that the trustee is seeking to employ specially by the Application to which this Verified Statement is attached.
3. The law firm of Brown & Crouppen, P.C., has substantial experience in personal injury cases. The law firm of Brown & Crouppen, P.C. has been retained to represent the debtor in her claim for personal injury as a result of an accident at an apartment complex. In the course of said representation the law firm of Brown & Crouppen, P.C. , it members and associates, have acquired a wealth of factual information and background which will facilitate the pursuit of said action on behalf of the trustee. The firm is willing to accept employment on the basis set forth in the annexed application.
4. Your declarant believes and alleges that pursuant to 11 U.S.C. Section 327(e), the law firm of Brown & Crouppen, P.C., its members and its associates, are not disqualified from representing the trustee specially in connection with the prosecution of the aforementioned personal injury action. Your declarant represents and alleges that the law firm of Brown & Crouppen, P.C., its partners or associates do not represent any or hold any interest adverse to the

debtors or to the estate with respect to the particular matter upon which it is to be employed.


5. Neither the firm nor any of its members have a prepetition or other claim against the estate.

6. We do not have any interest adverse to the trustee, the estate or the debtors.

7. We do not have any connections with the attorneys or accountants of the debtor, creditors, or any other party in interest, the United States Trustee, or any person employed in the office of the United States Trustee.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 18 day of Sept., 2015.

  
\_\_\_\_\_  
Shaun M. Falvey

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was mailed to all parties who have NOT BEEN ELECTRONICALLY NOTIFIED

September 23, 2015 with the correct postage prepaid and deposited in the U.S. Mail in Carbondale, Illinois.

Mr. Sean C. Paul  
PK Law  
8917 Gravois Road  
St. Louis, MO 63123

Mr. Shaun M. Falvey  
Brown & Crouppen, P.C.  
1 Metropolitan Square, Ste. 1600  
St. Louis, MO 63102

U.S. Department of Justice  
U.S. Trustee, Region 10  
Becker Building, Room 1100  
401 Main Street  
Peoria, IL 61602



Cynthia A. Hagan  
Hendricks & Hagan  
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Carbondale, IL 62901  
Tel: 618-529-2274  
Fax: 618-529-1638  
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